

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 21-12240**  
**Barbara Jean Sims AKA Barbara J** : **Chapter 13**  
**Taney Sims, AKA Barbara J Sims** : **Judge Ashely M. Chan**  
: **\* \* \* \* \***  
**Debtor(s)** :  
: **PNC Bank, National Association** :  
**Movant,** :  
**vs** :  
: **Barbara Jean Sims AKA Barbara J** :  
**Taney Sims, AKA Barbara J Sims** :  
**Oliver Sims** :  
: **Kenneth E. West**  
**Respondents.**

**NOTICE OF FORBEARANCE AGREEMENT EXTENSION PURSUANT TO A COVID-19 HARDSHIP**

COMES NOW, Manley Deas Kochalski LLC, on behalf of Secured Creditor, PNC Bank, National Association and files this Notice of Forbearance Agreement extension Pursuant to a COVID-19 Hardship (the "Notice") with the Court regarding Debtor's request for payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic, and in support of same, states as follows:

1. Debtor(s) requested a forbearance agreement related to a COVID-19 hardship with respect to Debtor's property located at 1173 South Evergreen Drive, Phoenixville, PA 19460.
2. Secured Creditor agreed to a payment forbearance for a period of 3 months starting with the month of January 1, 2022 and ending with the month of March 1, 2022 (the "Forbearance Period").

3. By this Notice, Secured Creditor is requesting that Debtor's (Debtors') counsel take whatever steps are necessary, if any, to formalize this agreement with the Bankruptcy Court, such as an Amended Plan, Request for Loss Mitigation or Notice of Loan Modification if same is required.

4. Secured Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment during the Forbearance Period, including, but not limited to, a lapse in insurance coverage or non-payment of property taxes.

5. Secured Creditor does not waive any rights to collect the payments that come due during the forbearance period after the forbearance plan ends, subject to the rules of the Bankruptcy Code.

6. Secured Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect any post-petition escrow shortage, subject to the rules of the Bankruptcy Code.

7. Furthermore, during the forbearance period Secured Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

Respectfully submitted,

/s/Alyk L. Oflazian

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Alyk L. Oflazian, Esquire (312912)  
Adam B. Hall (323867)  
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P.O. Box 165028  
Columbus, OH 43216-5028  
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Attorneys for Creditor

The case attorney for this file is Alyk L.  
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Counsel for Secured Creditor, PNC Bank,  
National Association

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: **Kenneth E. West** :  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Forbearance Agreement Extension Pursuant to a COVID-19 Hardship was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, Office of the Chapter 13 Standing Trustee, 1234 Market Street - Suite 1813, Philadelphia, PA 19107, ecfemails@ph13trustee.com

Timothy Wilfong, Attorney for Barbara Jean Sims AKA Barbara J Taney Sims, AKA Barbara J Sims, Law Office of Timothy E Wilfong LLC, 20 South Main Street, Phoenixville, PA 19460, timwilfong@aol.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on January 11, 2022:

Barbara Jean Sims AKA Barbara J Taney Sims, AKA Barbara J Sims, 1173 S. Evergreen Dr., Phoenixville, PA 19460

Oliver Sims, 1173 South Evergreen Drive, Phoenixville, PA 19460

DATE: 1/11/2022

/s/Alyk L. Oflazian

Alyk L. Oflazian, Esquire (312912)

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Attorneys for Creditor

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